

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

In Re:	)	CHAPTER 13
	)	
Luis A. Quintana, Jr.	)	CASE NO. 21-11436
	)	
	)	JUDGE ARTHUR I. HARRIS
	)	
Debtor(s)	)	<b><u>MOTION TO MODIFY PLAN</u></b>
	)	
	)	

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Now comes the Debtor, by and through the undersigned counsel, and hereby moves this Honorable Court to modify this chapter 13 plan. Debtor's bankruptcy was filed on April 23 25, 2021 and the Chapter 13 plan and is pending confirmation.

The modified plan attempts to resolve both the Objection to Confirmation filed by First Guaranty Mortgage Corp. by providing for payment of \$19,500.89 in pre-petition mortgage arrears which is the amount listed in their proof of claim.

The proposed modified plan also values the secured claim of the Internal Revenue Service at \$0.00 in Part 3.2. Finally, the modified plan provides for treatment to Cupco, LLC in Part 3.4.

WHEREFORE, Debtor prays this motion will be granted, modifying the Chapter 13 plan.

Respectfully Submitted,

/s/Alexander V. Sarady  
Alexander V. Sarady (0075500)  
Rauser & Associates  
1468 W. 9<sup>th</sup> St., Suite 300  
Cleveland, Ohio 44113  
Telephone: (216) 263-6200

Facsimile: (216) 263-6202  
Attorney for Debtor(s)

**CERTIFICATE OF SERVICE**

This is to certify that on July 12, 2021 a true and correct copy of the motion was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Lauren A. Helbling, at [ch13trustee@ch13cleve.com](mailto:ch13trustee@ch13cleve.com),

United States Trustee, at (Registered address)[@usdoj.gov](mailto:@usdoj.gov)

LeAnn E. Covey at [lcovey@clunkhooose.com](mailto:lcovey@clunkhooose.com)

Nicholas R. Oleski at [nro@mccarthylebit.com](mailto:nro@mccarthylebit.com)

Debtor:

Luis A. Quintana, Jr.  
1917 West 41st Street  
Lorain, OH 44053

Creditors:

City of Lorain Utilities Department  
1106 W. 1st St.  
Lorain, OH 44052

Credit Acceptance  
P.O. Box 551888  
Southfield, MI 48037

Cup Co LLC  
c/o McCarthy Lebit Crystal & Liffman  
101 W Prospect Ave, Ste 1800  
Cleveland, OH 44115

Cupco, LLC c/o Nicholas Oleski, Esq.  
101 W. Prospekt Ave., Suite 1800  
Cleveland, OH 44114

Ethan J Clunk  
Clunk House Co LPA  
4500 Courthouse Blvd Suite 400  
Stow, OH 44224

First Guaranty Mortgage Corp  
15480 Laguna Canyon Road Suite 100  
Irvine, CA 92618

IRS  
Insolvency Group 3  
1240 E 9th St  
Room 493  
Cleveland, OH 44199

IRS  
Centralized Insolvency Operations  
PO Box 21126  
Philadelphia, PA 19114

IRS  
PO Box 21125  
Philadelphia, PA 19114-0325

Lend Us  
3240 Stone Valley Road West  
Alamo, CA 94507

Lorain County Clerk of Court  
225 Court St., First Fl.  
Elyria, OH 44035

Lorain County Court of Common Pleas  
Attn: 19 CV 199317  
225 Court Street  
Elyria, OH 44035

One Main  
P.O. Box 742536  
Cincinnati, OH 45274-2536

Phoenix Financial Services  
8902 Otis Ave.  
103A  
Indianapolis, IN 46216

Rushmore Loan Management Services  
Customer Care Department  
P.O. Box 814529  
Dallas, TX 75381-4529

The Illuminating Company  
76 S. Main St.  
Akron, OH 44308-1890

/s/Alexander V. Sarady  
Alexander V. Sarady (0075500)  
Attorney for Debtor(s)